

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 04-10064-RGS
	)	
ROBERT P. BARRY,	)	
	)	
Defendant.	)	

**JOINT INITIAL STATUS MEMORANDUM**

Pursuant to Local Rule 116.5, the parties hereby submit this Joint Memorandum to address issues relative to the progress of this case.

1. The parties do not seek relief from applicable timing requirements imposed by the local rule.
2. The parties do not seek discovery concerning any expert witnesses, pursuant to Fed. R. Crim. P. 16(a)(1)(E).
3. Although the government has provided to the defendant all documents and other discoverable materials in this case pursuant to automatic discovery, the government may receive additional discoverable information, which it will turn over to the defense. Additionally, the defendant does not presently have any discoverable information, but pursuant to their agreement to provide reciprocal discovery, will provide the government with any such information received in the future.
4. The defendant does not intend to file any dispositive motions in this case at this time.
5. The parties, therefore, request that the period between March 18, 2004 (Order on Detention) and May 5, 2004 (Initial Status Conference)-- 49 days -- be excluded under the Speedy Trial.
6. There have been discussions between the parties regarding the possibility of an early resolution of the case, and the parties anticipate that this case will be resolved by plea agreement.
7. The parties do not believe that a Final Status Conference is necessary, and request that this case be

forwarded to the district judge.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

ROBERT P. BARRY  
Defendant

By: /s/Antoinette E.M. Leoney  
ANTOINETTE E.M. LEONEY  
Assistant U.S. Attorney  
1 Courthouse Way, Suite 9200  
Boston, MA 02210  
(617) 748-3103

/s/Francisco J. Fernandez/AEL  
Frank J. Fernandez, Esq.  
Four Longfellow Place,  
Suite 3501-06  
Boston, MA 02114  
(617) 393-0250

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